

1 THE HONORABLE JOHN H. CHUN
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE
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13 FEDERAL TRADE COMMISSION, *et al.*

14 Plaintiffs,

15 v.

16 AMAZON.COM, INC., a corporation,

17 Defendant.

18 CASE NO.: 2:23-cv-01495-JHC

19 [PROPOSED] STIPULATED
20 ORDER TO TEMPORARILY
21 SEAL THE COMPLAINT

22 Plaintiff Federal Trade Commission (“FTC”) and Defendant Amazon.com, Inc.

23 (“Amazon”), having filed their Joint Motion for Entry of Order Resolving Plaintiff FTC’s
Motion for Leave to Temporarily Seal the Complaint (the “Motion”), and the Court having
considered all filings concerning this matter, the Motion is GRANTED. The Court hereby

24 ORDERS:

1. Plaintiffs’ Complaint (Dkt. #3) shall be temporarily sealed.

2. The FTC shall provide copies by email of this Order to all persons or entities
(hereinafter referred to as “producing parties”) who provided information or documents
designated as confidential to the FTC during its pre-complaint investigation, where such
information or documents are disclosed or reflected in the Complaint.

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[PROPOSED] STIPULATED ORDER
TO TEMPORARILY SEAL THE COMPLAINT - 1
CASE NO. 2:23-cv-01495-JHC

26 FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, NW
Washington, DC 20580
(202) 326-2222

1 3. Amazon or any other producing party shall file any motion to permanently seal
2 parts of the Complaint no later than October 27, 2023.

3 4. If no producing party files a motion to permanently seal parts of the Complaint by
4 October 27, 2023, the Clerk of the Court shall unseal the Complaint.

5 5. If producing parties file motions to permanently seal any part of the Complaint by
6 October 27, 2023, the FTC may file a public version of the Complaint that redacts only the
7 portions of the Complaint that a producing party has moved to permanently seal.

8 6. After the Court resolves any outstanding motions filed pursuant to paragraph 3 of
9 this Order, the FTC shall file a public version of the Complaint consistent with the Court's order
10 resolving such outstanding motions.

11 7. The FTC's original Motion for Leave to Temporarily Seal Portions of the
12 Complaint (Dkt. #2) is DENIED as moot.

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1 **IT IS SO ORDERED.**

2 Dated this _____ day of _____, 2023.

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THE HONORABLE JOHN H. CHUN
6 **UNITED STATES DISTRICT JUDGE**

7 Presented by:

8 s/ Edward H. Takashima
9 EDWARD H. TAKASHIMA (DC Bar # 1001641)
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12 *Attorney for Plaintiff*
Federal Trade Commission

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[PROPOSED] STIPULATED ORDER
TO TEMPORARILY SEAL THE COMPLAINT - 3
CASE NO. 2:23-cv-01495-JHC

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